

Fill in this information to identify the case:

Debtor 1 German P. Fernandez

Debtor 2 Theresa A. Fernandez
(Spouse, if filing)

United States Bankruptcy Court for the: Western District of PA

Case number 19-10642 JCM

Form 4100R

Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of Creditor: MidFirst Bank

Court claim no. (if known): 10

Last 4 digits of any number you use to identify the debtor's account: 6324

Property address:

786 North Broad Street Extension
Grove City, PA 16127

Part 2: Prepetition Default Payments

Check one:

☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.

☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ _____

Part 3: Postpetition Mortgage Payment

Check one:

☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: As of the date of handoff from the trustee the account was and remains due for the 9/1/2024. The current amount owing on the account is \$2,144.78

☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due:

(a) \$ _____

b. Total fees, charges, expenses, escrow, and costs outstanding:

+ (b) \$ _____

c. **Total.** Add lines a and b.

(c) \$ _____

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

Debtor(s) German P. Fernandez and Theresa A. Fernandez
First Name Middle Name Last Name

Case Number (if known): 19-10642 JCM

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

- ☐ I am the creditor.
☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

x/s/ Brent J. Lemon

Date 10/14/2024

Brent Lemon
14 Oct 2024, 11:02:53, EDT

KML Law Group, P.C.
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Philadelphia, PA 16106
215-627-1322
bkrgroup@kmlawgroup.com
Attorney for Creditor

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**IN RE: German P. Fernandez
Theresa A. Fernandez**

Debtor(s)

MidFirst Bank

Movant

vs.

**German P. Fernandez
Theresa A. Fernandez**

Debtor(s)

Ronda J. Winnecour,

Trustee

BK NO. 19-10642 JCM

Chapter 13

Related to Claim No. 10

**CERTIFICATE OF SERVICE
RESPOSNE TO NOTICE OF FINAL CURE MORTGAGE PAYMENT**

I, Brent J. Lemon of KML Law Group, P.C., certify that I am, and at all times hereinafter mentioned was, more than 18 years of age and that on October 16, 2024, I served the above captioned pleading, filed in the proceeding on the parties at the addresses shown below:

Debtor(s)

Theresa A. Fernandez
786 North Broad Street Extension
Grove City, PA 16127

German P. Fernandez
786 North Broad Street Extension
Grove City, PA 16127

Attorney for Debtor(s) (via ECF)

Daniel P. Foster, Esquire
Foster Law Offices
1210 Park Avenue
Meadville, PA 16335

Trustee (via ECF)

Ronda J. Winnecour
Suite 3250, USX Tower
600 Grant Street
Pittsburgh, PA 15219

Method of Service: electronic means or first-class mail.

Dated: October 16, 2024

/s/ Brent J. Lemon

Brent J. Lemon
Attorney I.D. 86478
KML Law Group, P.C.
BNY Mellon Independence Center
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Philadelphia, PA 19106
(412) 475-8764
blemon@kmlawgroup.com